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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Jose Tufic Ibrahim, Eman Makhoul De Tufic;
Alondra Tufic Makhoul; Vanessa Tufic
Makhoul; Yoselin Tufic Makhoul

Plaintiffs,

vs.

**United States Department of Homeland
Security; United States Citizenship and
Immigration Services; Alejandro Mayorkas,**
Secretary, Department of Homeland Security;
Ur M. Jaddou, Director, U.S. Citizenship and
Immigration Services; **Ted H. Kim**, Associate
Director of Refugee, Asylum, and International
Operations; **San Francisco Asylum Office;**
Danielle Lehman, Director of the San
Francisco Asylum Office; **Matthew D.**
Emrich, Associate Director of USCIS Fraud
Detection and National Security Directorate;
Christopher A. Wray, Director of Federal
Bureau of Investigations

Defendants.

Case No.:

**COMPLAINT FOR DECLARATORY
RELIEF AND FOR A WRIT IN THE
NATURE OF IMMIGRATION MANDAMUS**

INTRODUCTION

1
2 1. This action is brought by Plaintiffs Jose Tufic Ibrahim; Eman Makhoulf, Alondra Tufic
3 Makhoulf, Vanessa Tufic Makhoulf and Yoselin Tufic Makhoulf, by and through their attorney,
4 to request issuance of a writ of mandamus or in the nature of mandamus and/or to compel under
5 the Administrative Procedure Act (“APA”) ordering Defendants and those acting under them to
6 process an Application for Asylum and for Withholding of Removal which was received and
7 pending as of July 21, 2017, and which has still not been called for an interview.
8
9

10 2. On July 21, 2017, Plaintiff Jose Tufic Ibrahim filed an I-589 Application for Asylum and
11 for Withholding of Removal with Defendant United States Citizenship and Immigration
12 Services. **(Exhibit A- I-589 Application for Asylum and Withholding of Removal and**
13 **Acknowledgement of Receipt).** The asylum case was assigned to the Miami Asylum office to
14 be processed and scheduled for an asylum interview.
15

16 3. Subsequent to the date that Mohamed M. Bustani filed his I-589 Application for Asylum
17 and Withholding of Removal, he relocated from his residence in Miami, Florida which is in the
18 geographic jurisdiction of the Miami Asylum Office to Bakersfield, California which is the
19 geographic jurisdiction of the San Francisco Asylum Office. On July 21, 2023 the Miami
20 Asylum Office sent an e-mail to Plaintiff Jose Tufic Ibrahim which confirmed that Plaintiff’s
21 pending asylum case had been transferred to the Defendant San Francisco Asylum office.
22 **(Exhibit B – July 21, 2023 letter from Miami Asylum Office).**
23
24

25 4. Defendants have violated the Administrative Procedures Act (“APA”) by failing to
26 schedule Plaintiff Jose Tufic Ibrahim’s asylum application for an interview which has been
27

1 pending now for over six years. Plaintiffs seek to compel Defendants, through a writ of
2 mandamus, to schedule an interview(s) for the pending asylum application.

3
4 **PARTIES**

5 5. Plaintiff JOSE TUFIC IBRAHIM is a citizen of Venezuela. Plaintiff Jose Tufic Ibrahim
6 filed his I-589 Application for Asylum and Withholding of Removal on July 21, 2017.

7 6. Plaintiff EMAN MAKHLOUF DE TUFIC is a citizen of Venezuela and is the spouse of
8 Jose Tufic Ibrahim and is a derivative applicant on her spouse's I-589 Application for Asylum
9 and Withholding of Removal.

10 7. Plaintiffs ALONDRA TUFIC MAKHLOUF, VANESSA TUFIC MAKHLOUF and
11 YOSELIN TUFIC MAKHLOUF are the minor children of Plaintiffs Jose Tufic Ibrahim and
12 Eman Makhlof De Tufic and are also listed as derivative applicants on their father's I-589
13 Application for Asylum and Withholding of Removal.

14 8. Defendant UNITED STATES DEPARTMENT OF HOMELAND SECURITY
15 (hereinafter "DHS") is an agency of the United States government involved in the acts
16 challenged, employs the officers named as defendants, and includes the U.S. Citizenship and
17 Immigration Services and the officers named as defendants in this complaint.

18 9. Defendant UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES
19 (hereinafter "USCIS") is an agency of the United States government under the DHS, overseeing
20 the officers named as defendants in this Complaint.

21 10. Defendant ALEJANDRO MAYORKAS (hereinafter "Secretary Mayorkas") is the
22 Secretary of the Department of Homeland Security. This suit is brought against Secretary
23

1 Mayorkas in his official capacity, as he is charged with the administration and enforcement of all
2 immigration and citizenship laws that are bound in the powers, duties, and functions of the
3 Department of Homeland Security.
4

5 11. Defendant UR M. JADDOU (hereinafter “Director Jaddou”) is the Director of USCIS,
6 the Agency charged with adjudicating Plaintiff’s asylum application. This suit is brought against
7 Director Jaddou in her official capacity, as she is charged with oversight, administration, and
8 execution of immigration laws of the United States.
9

10 12. Defendant TED H. KIM (hereinafter “Acting Associate Director Kim”) is the Acting
11 Associate Director of Refugee, Asylum, and International Operations. This suit is brought
12 against Acting Associate Director Kim in his official capacity, as he is charged with supervision
13 over all asylum offices, and requires some applications to be forwarded to headquarters before
14 final adjudication, and may, upon information and belief, have ordered that Plaintiff’s case be
15 forwarded to his office for its review.
16

17 13. Defendant SAN FRANCISCO ASYLUM OFFICE (hereinafter “San Francisco Asylum
18 Office”) is an office within USCIS and the federal agency with direct authority and responsibility
19 to adjudicate Plaintiff Jose Tufic Ibrahim’s asylum application.
20

21 14. Defendant DANIELLE LEHMAN (hereinafter “Director Lehman”) is the director of the
22 San Francisco Asylum office. This suit is brought against Director Lehman in her official
23 capacity, as she is charged overseeing the adjudication of the asylum applications at the San
24 Francisco Asylum Office in a timely manner, and ensuring the efficiency of the officers
25 employed.
26
27

1 15. Defendant MATTHEW D. EMRICH (hereinafter “Associate Director Emrich”) is the
2 Associate Director of USCIS Fraud Detection and National Security Directorate. This suit is
3 brought against Associate Director Emrich in his official capacity, as he supervises all USCIS
4 staff who review asylum applications to ensure that immigration benefits are not granted to
5 individuals who pose a threat to national security or public safety, or who seek to defraud the
6 immigration system. Certain applications must be reviewed by the Fraud Detection and National
7 Security Directorate before their final adjudication. Upon information and belief, USCIS has not
8 processed Plaintiffs’ asylum application because the Fraud Detection and National Security
9 Directorate has never completed its review.

12 16. Defendant CHRISTOPHER A. WRAY (hereinafter “Director Wray”) is the Director of
13 the Federal Bureau of Investigations. This suit is brought against Director Wray in his official
14 capacity, as he is responsible for overseeing the background checks involved with immigration
15 matters.
16

17 JURISDICTION

18
19 17. The Administrative Procedure Act recognizes a right of judicial review for any person
20 “suffering legal wrong because of an agency action or aggrieved or adversely affected by such
21 action within the meaning of any relevant statutes.” 5 U.S.C. § 702. Plaintiffs suffered a legal
22 wrong and continue to suffer because of the Defendants’ failure to act upon the pending Asylum
23 application for indefinite periods of time.
24

25 18. This Court has jurisdiction over the present action pursuant to 8 C.F.R. § 204,
26 Immigration & Nationality Act §203 (b)(1)(C); 28 U.S.C. § 1131; 28 U.S.C. §1361, the
27

1 Mandamus Act; 28 U.S.C. §2201, the Declaratory Judgment Act; and 5 U.S.C. §701-706, the
2 Administrative Procedures Act. Costs and attorney fees will be sought pursuant to the Equal
3 Access to Justice Act, 5 U.S.C. §504 and 28 U.S.C. §2412(d), et seq. Relief is requested pursuant
4 to said statutes.
5

6 19. The APA also provides pursuant to 5 U.S.C. § 706(1) that courts “shall compel agency
7 action unlawfully withheld.” Courts have held that this provision eliminates court discretion to
8 grant relief once an agency has violated a statutory deadline. *See Biodiversity Legal Foundation*
9 *v. Badgley*, 309 F.3d 1166, 1178 (9th Cir. 2002) (noting that when “Congress has specifically
10 provided a deadline for performance, ... no balancing of factors is required or permitted.”
11

12 20. The presumption favoring judicial review is well-settled and it has been applied in the
13 context of immigration law. *See Kucana v Holder*, 558 U.S. 233, 251 (2010). In *Kucana* at
14 252, the Supreme Court noted that it is assumed that Congress legislates with knowledge of this
15 presumption. Such presumption can only be overcome when “the congressional intent to
16 preclude judicial review is fairly discernable in the statutory scheme”. *Block v Cnty. Nutrition*
17 *Inst.*, 467 U.S. 340, 351, 104 S. Ct. 2450, 81 L.Ed. 2d 270 (1984).
18
19

20 21. The authority of an alien to apply for asylum is found at 11 U.S.C. §1158(a) which states
21 that: “An alien who is physically present in the United States or who arrives in the
22 United States (whether of not at a designated port of arrival and including an
23 alien who is brought to the United States after having been interdicted in
24 international or United States waters) irrespective of such alien’s status, may
25 apply for asylum in accordance with this section, or where applicable,
26 section 1225(b) of this title”
27

28 11 U.S.C. §1158(a) does not contain any language barring a private right of action

1 under the APA. Plaintiffs contend that this Court may properly review the claims for relief
2 herein because the limitation on a private right of action applies only to 11 U.S.C. §1158(d), and
3 in this case, their right to have their claim for asylum timely scheduled is premised upon 11
4 U.S.C. §1158(a), not 11 U.S.C. §1158(d).

5
6 22. Courts have found that claimants whose applications have been unreasonably delayed
7 may be afforded relief under the Administrative Procedure Act's requirements that agencies must
8 adjudicate within a reasonable period of time. See *Dae Hyun Kim v Ashcroft*, 340 F.2d Supp.
9 384, 393 (S.D.N.Y 2004) "Moreover, although there is no statutory or regulatory deadline by
10 which USCIS must adjudicate an application, at some point, Defendants failure to take any
11 action runs afoul of Section 555(b) [APA]; *Villa v DHS*, 607 F. Supp. 2d 359, 35 (N.D.N.Y.
12 2009) finding that pursuant to 5 U.S.C. §555 (b) of the APA, USCIS must adjudicate
13 applications within a reasonable period of time. Because the APA provides an independent
14 basis for federal jurisdiction from 8 U.S.C. §1158(d)(7), this Court has jurisdiction to hear the
15 subject Complaint.
16
17

18 VENUE

19 23. Venue is proper in this Court, pursuant to 28 U.S.C. § 1391(e)(1), which provides that in
20 a civil action in which each defendant is an officer or employee of the United States or any
21 agency thereof acting in his or her official capacity, or under the color of legal authority, or any
22 agency of the United States, the action may be brought in any judicial district in which a
23 substantial part of the events or omissions giving rise to the claim occurred. Plaintiff contends
24 that a substantial part of the events which give rise to the subject claim occurred in this judicial
25 district. No real property is involved in this action. Therefore, venue is proper in this Court.
26
27

EXHAUSTION OF REMEDIES

24. Plaintiffs have no administrative remedies. Since Plaintiff Jose Tufic Ibrahim filed his I-589 Application for Asylum and Withholding of Removal on July 21, 2017, he has received no correspondence or communications whatsoever from Defendants about the pending asylum application and when it will be scheduled for an interview. There are no administrative remedies for neglect of duty.

CAUSE OF ACTION

25. Pursuant to 8 U.S.C. §1158, Plaintiff Jose Tufic Ibrahim filed an Application for Asylum and Withholding of Removal with Defendant United States Citizenship and Immigration Services on July 21, 2017. (**Exhibit A – I-589 Application for Asylum and Withholding of Removal and Acknowledgement of Receipt**). Since that date, he has received no further communications or information from any Defendants about when his asylum interview would be scheduled or how much longer he would have to wait to have his interview scheduled, rather, there has been a complete lack of communication from Defendants. Plaintiffs therefore have no way of knowing how much longer the scheduling process will take.

26. Under 28 U.S.C. § 1361, the district courts shall have original jurisdiction of any action in the nature of a mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff.

27. Under the Administrative Procedures Act, a person suffering legal wrong because of agency action, or adversely affected or aggrieved by agency action within the meaning of a relevant statute, is entitled to judicial review thereof.

1 28. Defendants have a statutory duty to adjudicate asylum requests within 180 days of filing
2 pursuant to 8 U.S.C. § 1158(d)(5)(A)(iii). It has been more than six years since Plaintiff Jose
3 Tufic Ibrahim applied for Asylum and his case has still not been scheduled for an interview.
4

5 29. Plaintiff has no adequate remedy at law, and will continue to suffer irreparable harm if
6 the asylum application is not promptly scheduled for an interview and adjudicated.

7 31. Pursuant to 28 U.S.C. § 1361, this Court has “original jurisdiction in the nature of the
8 mandamus to compel an officer or employee of the United States or any agency thereof to
9 perform a duty owed to the [Plaintiffs.]”
10

11 32. Pursuant to 28 U.S.C. § 1651, this Court may issue any and all “writs necessary or
12 appropriate in aid of [the Court’s] respective jurisdiction [] and agreeable to the usages and
13 principles of law.”
14

15 **CLAIM FOR RELIEF**

16 33. Plaintiffs’ claim in this action is clear and certain. Plaintiffs reallege paragraphs 1
17 through 32, and, as if fully set forth, Plaintiffs are entitled to an order in the nature of mandamus
18 to compel Defendants to complete administrative processing and schedule an interview for the
19 pending Asylum application.
20

21 34. As a result of Defendants’ failure to perform their duties, Plaintiffs have suffered, are
22 suffering, and will continue to suffer irreparable harm. Specifically:
23

- 24 a. Plaintiffs have been irreparably damaged from the fear of not knowing what will happen
25 with the asylum case for the past six years. They have been constantly hoping for a date
26 to interview for the application for asylum, so they would not have to worry about their
27

1 future. Because of the long wait and unknowing, Plaintiff is enduring significant
2 psychological damage.

- 3
4 b. The delay is causing irreparable harm to Plaintiffs who are not able to continue with their
5 lives in the United States without fear of returning to Venezuela, a country where they
6 will more likely than not be persecuted, tortured, or killed.

7 35. The Defendants, in violation of the Administrative Procedures Act, are unlawfully
8 withholding or unreasonably delaying action on Plaintiff Jose Tufic Ibrahim's application, and
9 have failed to carry out the non-discretionary adjudicative functions delegated to them by law
10 with regard to his case.
11

12 36. The Defendants, in violation of the Administrative Procedures Act and 22 C.F.R.
13 42.81(a), are unlawfully withholding or unreasonably delaying action on Plaintiff Jose Tufic
14 Ibrahim's application and have failed to carry out the non-discretionary adjudicative functions
15 delegated to them by law with regard to his case.
16

17 37. The duty of the Defendants is non-discretionary, ministerial, and so plainly described as
18 to be free from doubt that mandamus is appropriate.
19

20 38. Plaintiff Jose Tufic Ibrahim has attempted to learn about the status of his pending Asylum
21 and Withholding of Removal application, all to no avail. Only Defendant San Francisco Asylum
22 Office is able to make decisions on scheduling an asylum interview, leaving no adequate remedy.
23 Accordingly, Plaintiffs have been forced to pursue the instant action.
24
25
26
27

PRAYER

39. WHEREFORE, in view of the arguments and authorities noted herein, Plaintiffs respectfully pray that the Defendants be cited to appear herein and that, upon due consideration, the Court:

- a. Accept jurisdiction and maintain continuing jurisdiction of this action;
- b. Declare as unlawful the violation by Defendants of failing to act on a properly filed Asylum and Withholding of Removal application;
- c. Declare Defendants' failure to carry out the adjudicative functions delegated to them by law with regard to Plaintiff's case as agency action unlawfully withheld and unreasonably delayed, pursuant to 5 U.S.C. § 706(1);
- d. Issue a writ in the nature of mandamus pursuant to 28 U.S.C. § 1361 and 5 U.S.C. § 706(1), compelling the Defendants to take action on Plaintiff Jose Tufic Ibrahim's Asylum and Withholding of Removal application by promptly scheduling his interview and then timely adjudicating his case;
- e. Grant attorney's fees and costs of this suit under the Equal Access to Justice Act, 28 U.S.C. § 2412;
- f. Grant such other relief at law and in equity as justice may require.

Dated this August 15, 2023

Respectfully Submitted,

/s/ Lewis Jubran

Lewis Jubran, Esq.
Counsel for Plaintiffs

**LIST OF EXHIBITS TO COMPLAINT FOR DECLARATORY RELIEF AND FOR A
WRIT IN THE NATURE OF IMMIGRATION MANDAMUS
TUFIC IBRAHIM v UNITED STATES DEPARTMENT OF HOMELAND SECURITY**

Exhibit	Description	Pages
A	I589 Application for Asylum and Withholding of Removal and Acknowledgment of Receipt	1-13
B	July 21, 2023 letter from Miami Asylum Office	14

EXHIBIT A

Department of Homeland Security
U.S. Citizenship and Immigration Services

U.S. Department of Justice
Executive Office for Immigration Review

OMB No. 1615-0067; Expires 12/31/2016

I-589, Application for Asylum and for Withholding of Removal

START HERE - Type or print in black ink. See the instructions for information about eligibility and how to complete and file this application. There is NO filing fee for this application.

NOTE: Check this box if you also want to apply for withholding of removal under the Convention Against Torture. ☒

Part A: Information About You			
1. Alien Registration Number(s) (A-Number) (if any) N/A		2. U.S. Social Security Number (if any) N/A	
3. Complete Last Name Tufic Ibrahim	4. First Name Jose	5. Middle Name Issa	
6. What other names have you used (include maiden name and aliases)? N/A			
7. Residence in the U.S. (where you physically reside)			
Street Number and Name 4920 NW 79th ave		Apt. Number 210	
City Doral	State Florida	Zip Code 33166	Telephone Number (661) 421-6277
8. Mailing Address in the U.S. (if different than the address in Item Number 7)			
In Care Of (if applicable):		Telephone Number ()	
Street Number and Name		Apt. Number	
City	State	Zip Code	
9. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	10. Marital Status: <input type="checkbox"/> Single <input checked="" type="checkbox"/> Married <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed		
11. Date of Birth (mm/dd/yyyy) 09/09/1968	12. City and Country of Birth Cuidad Bolivar Venezuela		
13. Present Nationality (Citizenship) Venezuelan	14. Nationality at Birth Venezuelan	15. Race, Ethnic, or Tribal Group Hispanic	16. Religion Catholic
17. Check the box, a through c, that applies: a. <input checked="" type="checkbox"/> I have never been in Immigration Court proceedings. b. <input type="checkbox"/> I am now in Immigration Court proceedings. c. <input type="checkbox"/> I am not now in Immigration Court proceedings, but I have been in the past.			
18. Complete 18 a through c.			
a. When did you last leave your country? (mm/dd/yyyy) 08/16/2015		b. What is your current I-94 Number, if any? 71137210030	
c. List each entry into the U.S. beginning with your most recent entry. List date (mm/dd/yyyy), place, and your status for each entry. (Attach additional sheets as needed.)			
Date 08/16/2015	Place Los Angeles, CA	Status Visa B1/B2	Date Status Expires 02/11/2016
Date 08/02/2013	Place Los Angeles, CA	Status Visa B1/B2	
Date	Place	Status	
19. What country issued your last passport or travel document? Venezuela		20. Passport Number 050777811 Travel Document Number	21. Expiration Date (mm/dd/yyyy) 10/09/2016
22. What is your native language (include dialect, if applicable)? spanish	23. Are you fluent in English? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
24. What other languages do you speak fluently?			
For EOIR use only.	For USCIS use only.	Action: Interview Date: _____ Asylum Officer ID#: _____	Decision: Approval Date: _____ Denial Date: _____ Referral Date: _____

Part A.II. Information About Your Spouse and ChildrenYour spouse ☐ I am not married. (Skip to Your Children below.)

1. Alien Registration Number (A-Number) (if any) N/A	2. Passport/ID Card Number (if any) 052374954	3. Date of Birth (mm/dd/yyyy) 08/21/1972	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name Makhlouf De Tufic	6. First Name Eman	7. Middle Name	8. Maiden Name Makhlouf De Tufic
9. Date of Marriage (mm/dd/yyyy) 05/04/1994	10. Place of Marriage Cuidad Bolivar Venezuela	11. City and Country of Birth Syria	
12. Nationality (Citizenship) Venezuelan	13. Race, Ethnic, or Tribal Group Hispanic	14. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	
15. Is this person in the U.S.? <input checked="" type="checkbox"/> Yes (Complete Blocks 16 to 24.) <input type="checkbox"/> No (Specify location):			
16. Place of last entry into the U.S. Los Angeles, California	17. Date of last entry into the U.S. (mm/dd/yyyy) 08/16/2015	18. I-94 Number (if any) 71137319030	19. Status when last admitted (Visa type, if any) B1/B2
20. What is your spouse's current status? N/A	21. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) 02/11/2016	22. Is your spouse in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	23. If previously in the U.S., date of previous arrival (mm/dd/yyyy)
24. If in the U.S., is your spouse to be included in this application? (Check the appropriate box.) <input checked="" type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Your Children. List all of your children, regardless of age, location, or marital status.

☐ I do not have any children. (Skip to Part A.III, Information about your background.)☒ I have children. Total number of children: 3

(NOTE: Use Form I-589 Supplement A or attach additional sheets of paper and documentation if you have more than four children.)

1. Alien Registration Number (A-Number) (if any) none	2. Passport/ID Card Number (if any) 055639071	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name Tufic Makhlouf	6. First Name Alondra	7. Middle Name Muna	8. Date of Birth (mm/dd/yyyy) 08/21/1998
9. City and Country of Birth Cuidad Bolivar Venezuela	10. Nationality (Citizenship) Venezuelan	11. Race, Ethnic, or Tribal Group Hispanic	12. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female
13. Is this child in the U.S.? <input checked="" type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location):			
14. Place of last entry into the U.S. Los Angeles, California	15. Date of last entry into the U.S. (mm/dd/yyyy) 08/16/2015	16. I-94 Number (if any) 71137275030	17. Status when last admitted (Visa type, if any) B1/B2
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) 02/11/2016	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input checked="" type="checkbox"/> Yes (Attach one photograph of your child in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Part A.II. Information About Your Spouse and Children (Continued)

1. Alien Registration Number (A-Number) (if any) none	2. Passport/ID Card Number (if any) 054910075	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name Tufic Markhlouf	6. First Name Vanessa	7. Middle Name Eman	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship) Venezuelan	11. Race, Ethnic, or Tribal Group Hispanic	12. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female
13. Is this child in the U.S.? <input checked="" type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location):			
14. Place of last entry into the U.S. Los Angeles, California	15. Date of last entry into the U.S. (mm/dd/yyyy) 08/16/2015	16. I-94 Number (if any) 71137284230	17. Status when last admitted (Visa type, if any) B1/B2
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) 02/11/2016	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input checked="" type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			
1. Alien Registration Number (A-Number) (if any) n/a	2. Passport/ID Card Number (if any) 054804902	3. Marital Status (Married, Single, Divorced, Widowed) Single	4. U.S. Social Security Number (if any) N/A
5. Complete Last Name Tufic Markhlouf	6. First Name Yoselin	7. Middle Name Salam	8. Date of Birth (mm/dd/yyyy) 11/25/1996
9. City and Country of Birth Cuidad Bolivar Venezuela	10. Nationality (Citizenship) Venezuelan	11. Race, Ethnic, or Tribal Group Hispanic	12. Gender <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female
13. Is this child in the U.S.? <input checked="" type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location):			
14. Place of last entry into the U.S. Los Angeles, California	15. Date of last entry into the U.S. (mm/dd/yyyy) 08/16/2015	16. I-94 Number (if any) 71137240230	17. Status when last admitted (Visa type, if any) B1/B2
18. What is your child's current status? N/A	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy) 02/11/2016	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input checked="" type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			
1. Alien Registration Number (A-Number) (if any)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location):			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (if any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Part A.III. Information About Your Background

1. List your last address where you lived before coming to the United States. If this is not the country where you fear persecution, also list the last address in the country where you fear persecution. (List Address, City/Town, Department, Province, or State and Country.)
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Number and Street (Provide if available)	City/Town	Department, Province, or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
Avenida Tachera quinta	Ciudad Bolivar	Estado bolivar	Venezuela	09/1968	08/2015
vigren milagriosla					

2. Provide the following information about your residences during the past 5 years. List your present address first.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Number and Street	City/Town	Department, Province, or State	Country	Dates	
				From (Mo/Yr)	To (Mo/Yr)
Avenida Tachera Quinta	Ciudad Bolivar	Estado Boilvar	Venezuela	09/1968	08/2015
Virge Milagriosla					

3. Provide the following information about your education, beginning with the most recent.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Name of School	Type of School	Location (Address)	Attended	
			From (Mo/Yr)	To (Mo/Yr)
MANCA MONTESORI	TRADITIONAL PRIVATE SCHOOL	CIUDAD BOLIVAR	1973	1979
CRISTO Rey	CATOLICA	CIUDAD BOLIVAR	1979	1980
HIGUEL DE CERVANTES	HIGH SCHOOL	CIUDAD BOLIVAR	1980	1985

4. Provide the following information about your employment during the past 5 years. List your present employment first.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Name and Address of Employer	Your Occupation	Dates	
		From (Mo/Yr)	To (Mo/Yr)
Mia 97.1 FM Calle Constitucion Cruce Con paseo	Radio program Owner	01/2015	08/2015
orinoco, edificio 1, planta alta local 1			

5. Provide the following information about your parents and siblings (brothers and sisters). Check the box if the person is deceased.
(NOTE: Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)

Full Name	City/Town and Country of Birth	Current Location
Mother Salam Ibrahim	Ciudad Bolivar	<input type="checkbox"/> Deceased
Father Issa Tufic	Ciudad Bolivar	<input type="checkbox"/> Deceased
Sibling Tagrid Tufi	Ciudad Bolivar	<input type="checkbox"/> Deceased
Sibling Maja Tufic	Ciudad Bolivar	<input type="checkbox"/> Deceased
Sibling Jesus Tufic	Ciudad Bolivar	<input type="checkbox"/> Deceased
Sibling Amel Tufic	Ciudad Bolivar	<input type="checkbox"/> Deceased

Part B: Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part B.)

When answering the following questions about your asylum or other protection claim (withholding of removal under 241(b)(3) of the INA or withholding of removal under the Convention Against Torture), you must provide a detailed and specific account of the basis of your claim to asylum or other protection. To the best of your ability, provide specific dates, places, and descriptions about each event or action described. You must attach documents evidencing the general conditions in the country from which you are seeking asylum or other protection and the specific facts on which you are relying to support your claim. If this documentation is unavailable or you are not providing this documentation with your application, explain why in your responses to the following questions.

Refer to Instructions, Part 1: Filing Instructions, Section II, "Basis of Eligibility," Parts A - D, Section V, "Completing the Form," Part B, and Section VII, "Additional Evidence That You Should Submit," for more information on completing this section of the form.

1. Why are you applying for asylum or withholding of removal under section 241(b)(3) of the INA, or for withholding of removal under the Convention Against Torture? Check the appropriate box(es) below and then provide detailed answers to questions A and B below.

I am seeking asylum or withholding of removal based on:

- | | |
|--------------------------------------|--|
| <input type="checkbox"/> Race | <input checked="" type="checkbox"/> Political opinion |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Membership in a particular social group |
| <input type="checkbox"/> Nationality | <input checked="" type="checkbox"/> Torture Convention |

- A. Have you, your family, or close friends or colleagues ever experienced harm or mistreatment or threats in the past by anyone?

- ☐ No ☒ Yes

If "Yes," explain in detail:

1. What happened;
2. When the harm or mistreatment or threats occurred;
3. Who caused the harm or mistreatment or threats; and
4. Why you believe the harm or mistreatment or threats occurred.

I am the owner of radio programs in Bolivar City, under the name MIA 97.1 FM since 2010. I also sell air-time to various media programs such as "Explosions by Simon" which denounces the Maduro led government as a dictatorship which commits human rights violations to the Venezuelan people. In 2015, as the government began to deteriorate from a political and economic sense, the government sought to silence any opposition. My radio program became a target of intense harassment and intimidation. Different government agencies requested excessive documentation of my ownership of the radio station and copies of permits that were given. Then the threatening phone calls started due our intense criticism of the Maduro led government. In the media business, disturbing phone calls are normal, but these phone calls were different. The phone calls had intimate knowledge of my wife and kids whereabouts.

- B. Do you fear harm or mistreatment if you return to your home country?

- ☐ No ☒ Yes

If "Yes," explain in detail:

1. What harm or mistreatment you fear;
2. Who you believe would harm or mistreat you; and
3. Why you believe you would or could be harmed or mistreated.

Yes, I fear that my life and the life of my family is endanger should I return to Venezuela. The Maduro Government will likely kill me or imprison me for being anti-maduro supporter. Currently anyone who opposes the current government is being killed during protests or die during torture.

Part B: Information About Your Application (Continued)

2. Have you or your family members ever been accused, charged, arrested, detained, interrogated, convicted and sentenced, or imprisoned in any country other than the United States?

☒ No

☐ Yes

If "Yes," explain the circumstances and reasons for the action.

- 3.A. Have you or your family members ever belonged to or been associated with any organizations or groups in your home country, such as, but not limited to, a political party, student group, labor union, religious organization, military or paramilitary group, civil patrol, guerrilla organization, ethnic group, human rights group, or the press or media?

☐ No

☒ Yes

If "Yes," describe for each person the level of participation, any leadership or other positions held, and the length of time you or your family members were involved in each organization or activity.

I am a member of the Anti maduro political group. I do not hold any leadership position. I have been a member since 2010.

- 3.B. Do you or your family members continue to participate in any way in these organizations or groups?

☒ No

☐ Yes

If "Yes," describe for each person your or your family members' current level of participation, any leadership or other positions currently held, and the length of time you or your family members have been involved in each organization or group.

4. Are you afraid of being subjected to torture in your home country or any other country to which you may be returned?

☐ No

☒ Yes

If "Yes," explain why you are afraid and describe the nature of torture you fear, by whom, and why it would be inflicted.

Maduro imprisons anyone who opposes his regime. There prisoners are fed feces for food. They are repeatedly beaten while being restrained. There are not given access to food, water, or medicine.

Part C. Additional Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part C.)

1. Have you, your spouse, your child(ren), your parents or your siblings ever applied to the U.S. Government for refugee status, asylum, or withholding of removal?

☒ No

☐ Yes

If "Yes," explain the decision and what happened to any status you, your spouse, your child(ren), your parents, or your siblings received as a result of that decision. Indicate whether or not you were included in a parent or spouse's application. If so, include your parent or spouse's A-number in your response. If you have been denied asylum by an immigration judge or the Board of Immigration Appeals, describe any change(s) in conditions in your country or your own personal circumstances since the date of the denial that may affect your eligibility for asylum.

- 2.A. After leaving the country from which you are claiming asylum, did you or your spouse or child(ren) who are now in the United States travel through or reside in any other country before entering the United States?

☒ No

☐ Yes

- 2.B. Have you, your spouse, your child(ren), or other family members, such as your parents or siblings, ever applied for or received any lawful status in any country other than the one from which you are now claiming asylum?

☒ No

☐ Yes

If "Yes" to either or both questions (2A and/or 2B), provide for each person the following: the name of each country and the length of stay, the person's status while there, the reasons for leaving, whether or not the person is entitled to return for lawful residence purposes, and whether the person applied for refugee status or for asylum while there, and if not, why he or she did not do so.

3. Have you, your spouse or your child(ren) ever ordered, incited, assisted or otherwise participated in causing harm or suffering to any person because of his or her race, religion, nationality, membership in a particular social group or belief in a particular political opinion?

☒ No

☐ Yes

If "Yes," describe in detail each such incident and your own, your spouse's, or your child(ren)'s involvement.

Part C. Additional Information About Your Application (Continued)

4. After you left the country where you were harmed or fear harm, did you return to that country?

☒ No

☐ Yes

If "Yes," describe in detail the circumstances of your visit(s) (for example, the date(s) of the trip(s), the purpose(s) of the trip(s), and the length of time you remained in that country for the visit(s).)

5. Are you filing this application more than 1 year after your last arrival in the United States?

☐ No

☒ Yes

If "Yes," explain why you did not file within the first year after you arrived. You must be prepared to explain at your interview or hearing why you did not file your asylum application within the first year after you arrived. For guidance in answering this question, see Instructions, Part 1: Filing Instructions, Section V. "Completing the Form," Part C.

The country conditions in my country are unstable. There are daily protests that have left people dead or injured. I sought an L1 visa but once the conditions of my country got worse, I sought asylum.

6. Have you or any member of your family included in the application ever committed any crime and/or been arrested, charged, convicted, or sentenced for any crimes in the United States?

☒ No

☐ Yes

If "Yes," for each instance, specify in your response: what occurred and the circumstances, dates, length of sentence received, location, the duration of the detention or imprisonment, reason(s) for the detention or conviction, any formal charges that were lodged against you or your relatives included in your application, and the reason(s) for release. Attach documents referring to these incidents, if they are available, or an explanation of why documents are not available.

Part F: To Be Completed at Asylum Interview, if Applicable

NOTE: You will be asked to complete this part when you appear for examination before an asylum officer of the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS).

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date (mm/dd/yyyy)

Write Your Name in Your Native Alphabet

Signature of Asylum Officer

Part G: To Be Completed at Removal Hearing, if Applicable

NOTE: You will be asked to complete this Part when you appear before an immigration judge of the U.S. Department of Justice, Executive Office for Immigration Review (EOIR), for a hearing.

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered ____ to ____ were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date (mm/dd/yyyy)

Write Your Name in Your Native Alphabet

Signature of Immigration Judge

Supplement A, Form I-589

A-Number (if available)	Date
Applicant's Name	Applicant's Signature

List All of Your Children, Regardless of Age or Marital Status
 (NOTE: Use this form and attach additional pages and documentation as needed, if you have more than four children)

1. Alien Registration Number (A-Number) (if any)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location):			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (if any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

1. Alien Registration Number (A-Number) (if any)	2. Passport/ID Card Number (if any)	3. Marital Status (Married, Single, Divorced, Widowed)	4. U.S. Social Security Number (if any)
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth (mm/dd/yyyy)
9. City and Country of Birth	10. Nationality (Citizenship)	11. Race, Ethnic, or Tribal Group	12. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female
13. Is this child in the U.S.? <input type="checkbox"/> Yes (Complete Blocks 14 to 21.) <input type="checkbox"/> No (Specify location):			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. (mm/dd/yyyy)	16. I-94 Number (if any)	17. Status when last admitted (Visa type, if any)
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? (mm/dd/yyyy)	20. Is your child in Immigration Court proceedings? <input type="checkbox"/> Yes <input type="checkbox"/> No	
21. If in the U.S., is this child to be included in this application? (Check the appropriate box.) <input type="checkbox"/> Yes (Attach one photograph of your spouse in the upper right corner of Page 9 on the extra copy of the application submitted for this person.) <input type="checkbox"/> No			

Part D. Your Signature

I certify, under penalty of perjury under the laws of the United States of America, that this application and the evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(a), provides in part: Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact in any application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, or knowingly presents any such application, affidavit, or other document containing any such false statement or which fails to contain any reasonable basis in law or fact - shall be fined in accordance with this title or imprisoned for up to 25 years. I authorize the release of any information from my immigration record that U.S. Citizenship and Immigration Services (USCIS) needs to determine eligibility for the benefit I am seeking.

Staple your photograph here or the photograph of the family member to be included on the extra copy of the application submitted for that person.

WARNING: Applicants who are in the United States illegally are subject to removal if their asylum or withholding claims are not granted by an asylum officer or an immigration judge. Any information provided in completing this application may be used as a basis for the institution of, or as evidence in, removal proceedings even if the application is later withdrawn. Applicants determined to have knowingly made a frivolous application for asylum will be permanently ineligible for any benefits under the Immigration and Nationality Act. You may not avoid a frivolous finding simply because someone advised you to provide false information in your asylum application. If filing with USCIS, unexcused failure to appear for an appointment to provide biometrics (such as fingerprints) and your biographical information within the time allowed may result in an asylum officer dismissing your asylum application or referring it to an immigration judge. Failure without good cause to provide DHS with biometrics or other biographical information while in removal proceedings may result in your application being found abandoned by the immigration judge. See sections 208(d)(5)(A) and 208(d)(6) of the INA and 8 CFR sections 208.10, 1208.10, 208.20, 1003.47(d) and 1208.20.

Print your complete name:

JOSE ISSA TUHIL IBRAHIM

Write your name in your native alphabet.

Did your spouse, parent, or child(ren) assist you in completing this application? ☒ No ☐ Yes (If "Yes," list the name and relationship.)

(Name)

(Relationship)

(Name)

(Relationship)

Did someone other than your spouse, parent, or child(ren) prepare this application?

☐ No☒ Yes (If "Yes," complete Part E.)

Asylum applicants may be represented by counsel. Have you been provided with a list of persons who may be available to assist you, at little or no cost, with your asylum claim?

☒ No☐ Yes

Signature of Applicant (The person in Part A.1.)

[Signature]

Sign your name so it all appears within the brackets

06/27/2017

Date (mm/dd/yyyy)

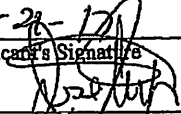
Part E. Declaration of Person Preparing Form, if Other Than Applicant, Spouse, Parent, or Child

I declare that I have prepared this application at the request of the person named in Part D, that the responses provided are based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language or a language he or she understands for verification before he or she signed the application in my presence. I am aware that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. 1324c and/or criminal penalties under 18 U.S.C. 1546(a).

Signature of Preparer		Print Complete Name of Preparer	
[Signature]		Henriegenes Joaquin Jiron	
Daytime Telephone Number		Address of Preparer: Street Number and Name	
(305) 783-8778		13543 NW 8th Street	
Apt. Number	City	State	Zip Code
	Miami	FL	33182

Supplement B, Form I-589

Additional Information About Your Claim to Asylum

A-Number (if available) n/a	Date 6-28-17
Applicant's Name JOSE TUFIC	Applicant's Signature 

NOTE: Use this as a continuation page for any additional information requested. Copy and complete as needed.

Part B

Question 1-A

No name was ever given, and no phone number was ever provided. Then, in order to operate the radio station the government would create new taxes and seek double taxation. The intent was clear, the government was applying pressure to stop transmitting the radio broadcast or close the means of communication. However, the health of Venezuela was at stake and the radio station continued its coverage of the abuses occurring in Venezuela.

In July 2015, armed men of the National Guard arrived at my radio station and wanted to speak to me. A gun was pointed to me, and one to the Guard said, "a bullet to head would silence me for good." The guards made it clear they knew what I owned and where my kids go to school. The guards left radio station. My car had been vandalized that day. Tires were removed and the car window was shattered. When I got home there was a Knife sticking out from the door. I checked to see if there was a note left behind, but I could not find it. I had connections in the police and I spoke to them regarding what transpired. I was told by a police officer that Maduro was imprisoning all people who directly opposed him. As owner of the radio station that speaks against Maduro, If I went to the police, I would just be imprisoned as an enemy of the government. Then, I made arrangements for me and my family to leave to the United States to seek sanctuary.

F
R
O
M

US DEPT OF HOMELAND SECURITY
US CITIZENSHIP & IMMIGRATION SVCS
1501 BISCAYNE BLVD
SUITE 300
MIAMI, FL 33132

NAME: JOSE TUFIC IBRAHIM
A-NUMBER: 216067106 RCPTH: ZMI1700340000

DATE: 7/24/17
FORM: I-589

*** ACKNOWLEDGEMENT OF RECEIPT ***

Your complete Form I-589 asylum application was received and is pending as of 7/21/17. You may remain in the U.S. until your asylum application is decided. If you wish to leave while your application is pending, you must obtain advance parole from USCIS. If you change your address, send written notification of the change within 10 days to the above address. You will receive a notice informing you when you and those listed on your application as a spouse or dependents must appear for an asylum interview. Bring to the interview 3 copies of documentary evidence of your relationship to those family members.

HERMOGENES JIRON
C/O LAW OFFICE OF JOAQUIN JIRON
15543 NW 8TH ST
MIAMI, FL 33182

EXHIBIT B

U.S. Department of Homeland Security
USCIS Miami Asylum Office
1501 Biscayne Blvd., Suite 300
Miami, FL 33132



U.S. Citizenship
and Immigration
Services

Date: 7/21/2023

JOSE TUFIC IBRAHIM
2651 BROOKESIDE DRIVE APT B
BAKERFIELD, CA 93311

Dear TUFIC IBRAHIM, JOSE

The Miami Asylum Office is in receipt of your request. Your attorney has been changed to reflect the G-28 submitted. We have received your AR11 and have updated your address accordingly. You are now under the jurisdiction of the San Francisco asylum office. Please ensure that you update any change of address within ten (10) business days of any change by going to www.uscis.gov/ar-11 and submitting an online request for change of address.

Sincerely,

Robert Driscoll, LAS

For Varsenik Papazian
Director
Miami Asylum Office